

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR
SYSTEMS PRODUCTS LIABILITY
LITIGATION

Master File No. 2:12-MD-02327
MDL 2327

ETHICON WAVE 11 CASES LISTED IN
EXHIBIT A

JOSEPH R. GOODWIN
U.S. DISTRICT JUDGE

**NOTICE OF ADOPTION OF PRIOR DAUBERT MOTION OF
THOMAS C. WRIGHT, M.D. FOR WAVE 11**

Comes now, the Plaintiffs, and hereby adopt and incorporate by reference the Daubert motion and memorandum filed in relation to Thomas C. Wright for Ethicon Wave 1, Dkt. 1986 (motion), Dkt. 1988 (memorandum in support) and the reply brief filed for Ethicon Wave 4, Dkt. 3844 (reply). Plaintiffs respectfully request that the Court exclude Thomas C. Wright's testimony, for the reasons expressed in the Wave 1 and 4 briefing. This notice applies to the following Wave 11 cases identified in Exhibit A attached hereto.

Dated: August 8, 2019

Respectfully submitted,

/s/ D. Renee Baggett

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EXHIBIT A

Bain, April	2:16-cv-11420
Bowers, Emily H. & Albert B., Jr.	2:14-cv-28907
Ellis, Kimberly Joan & William Ray	2:15-cv-03465
Gipson, Peggy J. & Frank	2:13-cv-32357
Haynes, Traci	2:13-cv-14424
Johnson, Deborah & Michael A.	2:14-cv-00773
Martin, Rosa	2:14-cv-13152
Middleton, Catherine	2:18-cv-00991
Ocasio, Marlene & Marcos	2:15-cv-03982
Oliveira, Renee & Antonio	2:18-cv-00612
Rosenfeld, Sandra R. & Robert M.	2:15-cv-14822
Sellers, Dina M. & Leon	2:13-cv-25344
Shea-Towers, Deborah & Brian	2:13-cv-01540
Simmons, Phyllis S.	2:14-cv-00839
Ullendorff, Doris & Ken Gorfinkle	2:18-cv-00894
Wagers, Carolyn	2:14-cv-10882
Weinkam, Barbara	2:18-cv-00937
Wielgopolski, Yolanda & Ken	2:13-cv-17180

CERTIFICATE OF SERVICE

I hereby certify that on August 8, 2019, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

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